

**U.S. DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

<b>SWEIGERT</b>	<b>CIVIL CASE #:</b>
<b>V.</b>	<b>1:18-CV-08653-VEC</b>
<b>GOODMAN</b>	<b>JUDGE VALERIE E. CAPRONI</b>

**CORRECTED - FIRST SUPPLEMENTAL DECLARATION OF**  
**THOMAS SCHOENBERGER**

The undersigned, Thomas Schoenberger, swears that the following declaration is true under the penalties of perjury.

I received an e-mail messages from the Plaintiff, which was also copied to the Defendant in the above styled case. The purpose of this e-mail message was to solicit testimony as a witness to the events that unfolded concerning ~~Manuel~~ Manuel Chavez, III of Carson City, Nevada.

I have personal knowledge of public statements made by the Defendant in social media video broadcasts concerning the alleged “distributed decentralized defamation campaign”. The Defendant has implicated the Plaintiff in various relationships with myself and Manuel Chavez, III and Robert David Steele.

To provide background.

At various times Mr. Chavez has operated the following Internet social media properties with Google, LLC (via its subsidiary YouTube, LLC).

- DEFANGO, 20,700 subscribers (aka IL1USIVEMAN)
- DANGER ZONE, 3,830 subscribers
- LARP WARS, 844 subscribers

In social media podcasts Mr. Chavez has admitted to working with a Virginia licensed attorney named **Steven S. Biss, esq;** representing (*pro hac vice*) Dallas-based businessman **Edward Butowsky**. The wife of this attorney (**Tanya Cornwell**) has allegedly paid incentives and monies to Mr. Chavez of at least \$1,500 on one occasion (via the Internet wire of the PayPal service). Tanya Cornwell has also admitted to drafting a pleading for the signature of Mr. Chavez to act as a plaintiff in a lawsuit against an adversary (Jason Goodman, presently broadcasting from Las Vegas, Nevada on the YouTube channel “CROWDSOURCE THE TRUTH 3”, as the JASON GOODMAN **channel** has received some sort of “strike” to prohibit uploads). The “complaint pleading” was intended to be filed in the courts of Arizona where Mr. Chavez resided at the time.

Published social media reports indicated that Mr. Edward Butowsky paid **\$20,000** to a team made up of Mr. Chavez, the undersigned, and other pseudo political operatives. Mr. Chavez and Mr. Butowsky discussed taking “active social media measures” (allegedly to include wiretapping targets) related to the “reputation protection” of Mr. Butowsky, as he was a FOX NEWS contributor who inserted himself into the Internet conspiracy known as the “Seth Rich affair”. Suffice to say that the Seth Rich conspiracy attracted intense attacks by conspiracy theorists that leverage social media as a public relations weapon (as in “weaponize”).

Mr. Chavez was working with Mr. Butowsky on a day by day basis in January and February 2018 in Dallas, Tex. Mr. Butowsky paid expenses, in the case of ~~the~~ **a** hotel **\$5,000**. Mr. Butowsky had allegedly concocted a story with FOX NEWS’s Malia Zimmerman that a murdered Democratic National Committee (DNC) staffer, Seth Rich, was the source of the infamous DNC e-mail messages leaked by the bulk data repository WikiLeaks during the 2016 Presidential primaries. The apparent motivation behind the article was to establish that Seth

Rich provided WikiLeaks with the DNC e-mail messages to shift the blame from Russian and help put to bed speculation that President Donald Trump colluded with the Russian Federation to influence the outcome of the election.

Public video broadcasts distributed by Mr. Chavez indicated that dozens of e-mail messages were exchanged between the undersigned, Mr. Chavez, Mr. Biss and others. These e-mail messages were apparently forwarded to Jason Goodman (Las Vegas, Nevada) by Mr. Chavez in the May – June 2019 timeframe.

The Plaintiff, D. George Sweigert, is not copied or otherwise included on the e-mail messages. The undersigned is unaware of any participation of the Plaintiff in any activities related to Jason Goodman in any manner, as the e-mail messages indicate.

The undersigned was privy to the discussions of Mr. Chavez with several of the parties that Jason Goodman claims participated in the so-called “distributed de-centralized defamation campaign”. The undersigned asserts that the Plaintiff was not a participant in such discussions, talks, communications, or e-mail message exchanges.

The claim that the Plaintiff was somehow working with, a business partner of, or in some manner colluded with the undersigned is incorrect and in error. No such association exists.

Signed this first day of April (4/1), 2021.

Respectfully,

/s/ Thomas Schoenberger

THOMAS SCHOENBERGER

Thomas Schoenberger  
Provo, Utah

**CERTIFICATE OF SERVICE**

The undersigned hereby attests under penalties of perjury that copies of this communication have been sent via electronic mail message to the following parties on the second day of April (4/2), two thousand and twenty-one (2021).

<b>Clerk of the Court, Room 200 U.S. District Court 500 Pearl Street New York, New York 10007-1312 temporary_pro_se_filing@nysd.uscourts.gov</b>	<b>Jason Goodman, CEO Multimedia System Design, Inc. 252 7<sup>th</sup> Avenue, Apart. #6S New York, NY 10001 truth@crowdsourcethetruth.org</b>
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